

## REMARKS

By this response, Applicants have amended each of independent claims 1, 12, 18, 21 and 23 to further clarify the present invention. In particular, the first network element is now defined as a "Service Control Function (SCF)" and the second network element is defined as a "Home Location Register".

Claims 1, 12, 18, 21 and 23 now clarify that the message sent to the Service Control Function (SCF) notifies the Service Control Function of a change in network user status information.

Finally, claims 1, 12, 18, 21 and 23 now clarify that the step of receiving a message at the Service Control Function (SCF) is triggered by a change in network status of a user. This is supported, for example, by Figures 3, 6 and their accompanying description.

### ***Claim Rejections – 35 USC § 102***

Examiner rejects claims 1-12, 14-18, 20-25 under 35 U.S.C. 102(b) as being anticipated by Naqvi et al. (US6,801,771).

Applicants have previously reasoned that Naqvi fails to teach "intelligent network service provision". Examiner agrees but then proceeds to give an exceptionally broad interpretation to the term "intelligent network". Respectfully, this interpretation is unjustified. The term "intelligent network" has a well-established meaning within the telecoms art and defines a network architecture where a node in a network, called a Service Switching Function (SSF) or a Service Switching Point (SSP), detects when a service needs to be applied, and refers a query to a Service Control Function (SCF) or a Service Control Point (SCP) to apply the service. The classic example of an intelligent network service is a toll free number, where a Service Switching Point detects that a user had dialed a toll free number and then queries a Service Control Function to convert the number to a local or national

number. Naqvi fails to describe this type of architecture since any application of a service is made at the proxy switch 300 of Naqvi itself.

Claims 1 and 12, 18, 21 and 23 now clarify that the first network element is a Service Control Function (SCF). This feature was previously recited in claim 7. The Examiner's rejection of claim 7 simply refers to "element 110 (MSC) and its description." Respectfully, the MSC of Naqvi is not a Service Control Function, as this term would normally be understood within the telecoms art, and the MSC does not provide intelligent network services.

Claims 1 and 12, 18, 21 and 23 now clarify that the step of receiving a message at the Service Control Function (SCF) is triggered by a change in network status of a user. Naqvi fails to describe this step. In Naqvi the proxy switch "requests subscriber profiles from the HLR for subscribers who roam into the area covered by the proxy switch" (see col.17 lines 37-43). This differs from what is presently claimed in two important respects. Firstly, the proxy switch of Naqvi will only receive data when a subscriber roams into the area covered by the proxy switch. Secondly, the proxy switch must request data. In the presently claimed invention, a Home Location Register detects a change in status of a user (e.g. user activated, user deactivated, user deleted, user identifier code updated, user service screened and user service suppressed) and sends a message to the Service Control Function to notify it of the change. This ensures that the Service Control Function always stores the up-to-date status of each user.

While all dependent claims are considered to be allowable at least by virtue of their dependency on an allowable base claim (claims 1, 12, 18, 21 and 23), Applicants make the following comments in support of certain dependent claims:

**Claims 3, 22:** the proxy switch of Naqvi can connect to alternative multiple networks (see Fig.3A, elements 300, 400). The passage at col.12 line 53-col.13 line 4 of Naqvi simply describes how the proxy switch can siphon traffic to a selected one of the alternative networks. This is not the same as what is required by claims 3, 22.

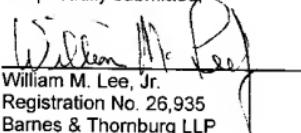
Claims 3, 22 are concerned with selecting which Service Control Functions need to be notified of a change in network user status information. Naqvi fails to teach anything relevant in this respect.

For the foregoing reasons, Applicants respectfully submit that the claims pending in this application are now in condition for allowance. Early issuance of a Notice of Allowance is solicited.

An appropriate Petition for Extension of Time is also submitted herewith.

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Respectfully submitted,



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